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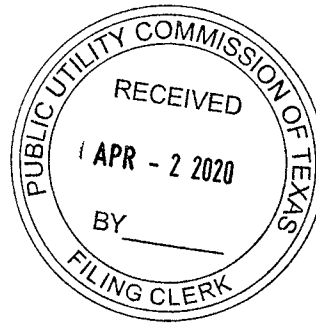


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April 2, 2020

To the Public Utility Commission of Texas,

Applicable Power Generation Companies:

- Shannon Wind, LLC – PGC Registration No. 20357
- Flat Top Wind I, LLC – PGC Registration No. 20433
- Foard City Wind, LLC – PGC Registration No. 20480
- Phoebe Energy Project, LLC – PGC Registration No. 20487

Per your request, please find below an outline of the documents being submitted which summarize the Innergex response to the COVID-19 Pandemic.

At Innergex' renewable energy projects, the overall approach to mitigating effects of the COVID-19 Pandemic has been one of collaboration and escalation as needed. As there are multiple parties on each site: Owner, Operator, Original Equipment Manufacturer (OEM), and various contractors; collaboration has been necessary to ensure all personnel on site are aware of and abiding by the most stringent guidance available at the time. As the virus has spread and its effects have permeated every aspect of our industry, Innergex and our OEMs (who are also our Operators) have responded with increasing vigilance to do our part in keeping our employees and contractors safe, and therefore slowing the spread.

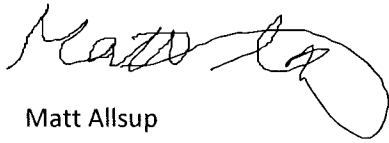
1. Innergex corporate response:
 - a. Summarized in document titled "INE_COVID-19_MEASURES"
 - b. Specific guidance for Operations Managers in document titled "INE_MESSAGE_FOR_OPERATIONS_MANAGERS_CORONAVIRUS_V1"
 - c. Personal monitoring/isolation guidance in document titled: "know-difference-self-monitoring-isolation-covid-19-eng (003)"
2. OEM responses summarized:
 - a. OEM 1: document titled "OEM 1 COVID response summary"
 - b. OEM 2: document titled "OEM 2 COVID response summary"
 - i. OEM 2 has also enacted a Pandemic Operations Plan that further restricts personal contact
 - c. OEM 3: document titled "OEM 3 COVID response summary"
3. Innergex site-level response:
 - a. Specific guidance for managing contractors: document titled "COVID-19 contractor access"
4. Activation of previously submitted Pandemic Preparedness Plans for all registered Power Generation Companies



Innergex Renewables USA LLC
4660 La Jolla Village Drive, Suite 680
San Diego, California 92122
United States

I am at your disposal for any questions.

Best Regards,

A handwritten signature in black ink, appearing to read "Matt Allsup", with a large, stylized loop at the end.

Matt Allsup

OEM 1 Response Summary

Contents

- Scope and field of application
- PPEs (Personal Protective Equipment) & other material to have available on site
- Prevention & control methods
- Increase employee education on hygiene
- Communication posters
- Isolation area set up
- Travel to or from affected areas
- Travel restrictions
- Return from affected areas
- Assessment in the workplace
- Passive screening
- Active Screening
- Suspected cases management
- Isolation and assessment
- Handover to local health authorities
- Medical department alert
- Disinfection rules during active screening period
- Building cleaning rules
- After a suspected case appears
- Investigation after a suspected case
- Packages & equipment reception handling
- Deliveries – Contact with deliverers, truck drivers, etc
- Equipment handling
- APPENDIX: Step by step process for putting on and removing PPE
- APPENDIX: Self quarantine protocol
- APPENDIX: Visitor Pre-screening questionnaire
- APPENDIX: Medical preparedness checklist

OEM 2 Response Summary

Travel Restrictions and Quarantine Guidance: in line with the generally accepted standards – this is in a constant state of flux

Visitor Restrictions: regarding recent travel, exposure to symptomatic people, showing symptoms themselves

Employee Updates and Shared Information: regular updates, decisions trees, health guidance and travel guidance for all employees.

Health Guidance: OEM is following guidance from the WHO, the CDC. Hygiene and handwashing posters are posted at all locations. Specific instructions have been given regarding self-monitoring, self-isolation.

Business Continuity Contingency Plans and Impact to Supply Chain: OEM is working to mitigate the impact on their global supply chain as much as possible.

Remote Operations Center: contingency plans are in place

OEM 3 Response Summary

Situational Awareness: *health/safety and business impacts monitored constantly*

Implementation of Modified Sick Leave Policy: *in line with typical response in the industry*

Personal Hygiene Practices: *in line with WHO, CDC guidance*

Travel Management: *in line with typical response in the industry*

Supply Chain Management: *OEM is working to mitigate the impact on their global supply chain as much as possible.*

Remote Operations Center: *contingency plans are in place*

COVID-19 Contractor Management

During the course of the COVID-19 epidemic we will have the need to continue allowing essential contract work at our projects. This work instruction provides guidance on how to manage these contractors in a way that largely eliminates contact and the risk of transmitting COVID-19.

1. Orientation.

Rather than the typical in-person orientation, make arrangements in advance with the contractor to perform the site orientation either over a corporate platform (Teams, Skype for Business, etc.) or a mobile platform (Skype, Zoom, Google Hangouts, etc.). Contractor's personnel can sign and scan the acknowledgements.

2. Use of O&M facility.

Make it clear that the crew, barring an emergency or a medical need, will NOT have access to the O&M facility. They must make arrangements for food, handwashing, restroom use, and other logistical concerns as if there was not a building available. There are plenty of jobsites where this is a reality, so while inconvenient, this is a manageable problem.

3. Visitor Log.

Have the contractor crew check in via phone call or text, both in the morning and the afternoon when leaving. We can sign them in/out when they check in

4. Shipping/receiving.

It may be necessary for the contractor to have a large amount of material shipped to the site to perform their scope. Make arrangements for them to come in early enough to inventory and load their material before the OEM crews need the bay, and ensure that your OEM crew knows what day this will take place.

5. Oversight / Safety Walk.

It is still important to have oversight of contractor tasks during this time. Observe the crews from a safe distance - at least the generally accepted 6' "Social Distancing" approach.



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Innergex COVID-19 Measures

Please find below a summary of measures taken by Innergex, along with internal communications provided to Innergex employees, regarding the Coronavirus Disease. They detail the onset of our watch, the issuance of guidance, and rules and prohibitions as the situation evolved, up to and including today.

Innergex has put in place several measures to support its employees:

- A committee meets daily via videoconference to evaluate the situation and decide on the next steps.
- Frequent communications are sent by email and are published on Connect, the corporate Intranet, to keep our employees informed.
- A dedicated email address, coronavirus@innergex.com, was created to answer employee questions.
- Flexible work arrangements are in place to allow our office employees to work from home and make adjustments to their schedule to reasonably balance work and family obligations.
 - Our Information Technology team has worked extensively in preparation for and support of these employees working remotely from the office
- All business travel has been cancelled, and travellers requested to self-isolate for 14 days upon return.
- Many prevention measures have been put in place in our offices and facilities, and we will add or update measures as required.

Office measures:

- Cleaning and disinfection of common spaces performed twice a day by the cleaning crews.
- Deep cleaning and disinfection of the office performed by the cleaning crews once a week.
- Sanitizer stations deployed on each floor and on every desk.
- Disinfecting wipes supplied in each office.
- Hygiene best practices reminder signage and messages displayed in areas of high traffic (kitchen, washrooms, meeting rooms).

Innergex has recommended good practices to help employees remain healthy:

- General good practices such as healthy eating and staying well-rested.
- Washing your hands properly and frequently, using both soap and water or alcohol-based hand sanitizers where washing facilities are unavailable.
- Ensuring frequent cleaning practices for personal and commonly shared hard surfaces, such as tabletops, doorknobs, telephones and keyboards to reduce the risk of spreading viruses.
- Increase social distancing and forgo usual greeting practices (e.g. handshakes).
- Cough or sneeze into your sleeve or elbow.



Innergex Renewables USA LLC
4660 La Jolla Village Drive, Suite 680
San Diego, California 92122
United States



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Innergex has limited access to its offices and facilities:

- In order to track a potential spread of the virus among our employees, an entry log is maintained for every office. Employees need to note all times when they enter and leave the office. The goal is to track when any employee is present in any of our offices (for the time being) so in the case that an employee tests positive, we can identify any other employee they could have been in contact with.
- A questionnaire is distributed to all visitors at offices and operating facilities to ensure visitors are not contagious and have not knowingly been in contact with a contagious person.

List of internal publications

2020-03-24 Coping with stress, anxiety and depression linked to the Coronavirus

2020-03-23 First case of Coronavirus at Innergex

2020-03-23 COVID-19 Questions and Answers

2020-03-23 Mandatory Filling of the Office Presence Log

2020-03-19 Containment vocabulary: Clarifying terms and applicable measures

2020-03-18 Confirmed or suspected Coronavirus contagion measures

2020-03-16 Your Health and Safety – Coronavirus and public transit

2020-03-12 New measures related to the Covid-19 Coronavirus

2020-03-06 Your Health and Safety – Coronavirus and Travel

2020-03-06 Office preparation measures related to the Covid-19 Coronavirus

2020-02-14 Your Health and Safety - Coronavirus



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4660 La Jolla Village Drive, Suite 680
San Diego, California 92122
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In these challenging times, you must be receiving many questions from your team members. We want to support you in this situation by providing you with clear and specific guidelines tailored for the managers of operations personnel, on top of the general directives and of specific ones for office personnel.

As long as an employee has no symptoms and has not been exposed to the virus, it is expected that they show up for work or be on call in accordance with the plan established by the senior director of operations in charge of the facility. If your jurisdiction's government imposes a lockdown, we will reassess the situation so that employees at a facility, which is an essential service, obtain the necessary paperwork to go to work at their site.

It is possible that healthy and non-exposed employees ask to work from home for family reasons. In this case, contact coronavirus@innnergex.com for guidance. Try to accommodate as far as possible an employee's schedule within a given week, but if the employee is unable to complete their hours, they must inform you and the missing time must be coded as "Personal". Please note that the salary conditions remain unchanged, however we want to be able to assess the costs related to lost productivity.

In any case, insofar as practicable, please ensure that employees present at a facility in small numbers, are not all from the same specialty (to avoid contamination of all of the only people capable of performing a given task), and ideally that they are not in the same working space at the same time.

It is also critical to keep virus-free all frequent common working spaces (control room, rest area, etc.), in particular the door and drawer handles, control panels, levers, vehicles, etc. that are touched by many people successively. Make sure you have enough disinfecting wipes and other cleaning material. Be aware that the life span of the virus on surfaces is not well known, but that it could survive for several days and could induce an indirect contamination among employees of the same facility, something that must be avoided at all costs.

If an employee develops symptoms, or claims to have been exposed to the virus, this person must then follow the general directives issued on March 18. They will be informed of the specific steps to follow. If the employee must self isolate but is not sick, you can ask that they continue working from home if doable. Any person who must stop working because of illness needs to contact coronavirus@innnergex.com and describe their situation so that Management can make decisions regarding their specific situation.

If you suspect that a person refuses to work (at the facility or from home) but is neither sick nor burdened with obvious family responsibilities, please contact your Vice President for assistance assessing the situation.

To maximize safety in our offices and facilities, it will become mandatory for any visitor to fill a questionnaire before gaining access in order to minimize contagion risks by a non-Innnergex person. This measure will be implemented on Thursday March 19.

KNOW THE DIFFERENCE: SELF-MONITORING, SELF-ISOLATION, AND ISOLATION FOR COVID-19

SYMPTOMS OF COVID-19



FEVER



COUGH



DIFFICULTY BREATHING

SELF-MONITORING



You have:

- ▶ no symptoms

AND

- ▶ a history of possible exposure to the novel coronavirus that causes COVID-19, in the last 14 days

SELF-ISOLATION

You have:

- ▶ no symptoms

AND

- ▶ a history of possible exposure to the novel coronavirus due to travel outside of Canada or close contact with a person diagnosed with COVID-19

ISOLATION

You have:

- ▶ symptoms, even if mild

AND

- ▶ you have been **diagnosed with COVID-19** or are waiting for the results of a lab test for COVID-19



SELF-MONITOR means to:

- ▶ **monitor yourself** for 14 days for one or more symptoms of COVID-19
- ▶ go about your day but **avoid crowded places** and increase your personal space from others, whenever possible

SELF-ISOLATE means to:

- ▶ **stay at home** and monitor yourself for symptoms, even if mild, for 14 days
- ▶ **avoid contact with other people** to help prevent the spread of disease in your home and in your community in the event you become symptomatic

To be **ISOLATED** means to:

- ▶ **stay at home** until your Public Health Authority advises you that you are no longer at risk of spreading the virus to others
- ▶ **avoid contact with other people** to help prevent the spread of disease in your home and in your community, particularly people at high risk of severe illness outcomes such as older adults or medically vulnerable people



You need to **self-monitor** if:

- ▶ you have reason to believe you have been **exposed to a person** with COVID-19



OR

- ▶ you are in **close contact** with older adults or medically vulnerable people

OR

- ▶ you have **been advised to self-monitor** for any other reason by your Public Health Authority

Self-isolate if:

- ▶ you have travelled **outside of Canada** within the last 14 days

OR

- ▶ your Public Health Authority has identified you as a **close contact** of someone diagnosed with COVID-19

You need to **isolate** if:

- ▶ you have been **diagnosed** with COVID-19

OR

- ▶ you are **waiting to hear the results** of a laboratory test for COVID-19

OR

- ▶ you have been **advised to isolate at home** for any other reason by your Public Health Authority



If you develop symptoms, **isolate yourself from others immediately** and contact your **Public Health Authority** as soon as possible

If you develop symptoms, even if mild, **stay home, avoid other people** and contact your **Public Health Authority** as soon as possible

If your symptoms get worse, immediately contact your healthcare provider or **Public Health Authority** and follow their instructions

WE CAN ALL DO OUR PART IN PREVENTING THE SPREAD OF COVID-19. FOR MORE INFORMATION:

1-833-784-4397

@canada.ca/coronavirus

phac.info.aspc@canada.ca